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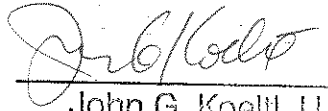
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February 7, 2023

BY ECF

Hon. John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED
SO ORDERED

2/7/23 
John G. Koeltl, U.S.D.J.

Re: *United States v Dramion Coombs*, 21 Cr. 336 (JGK)

Your Honor:

I represent Dramion Coombs in the referenced case and write to request that his bond be modified by removing the condition of curfew. I have conferred with the government and the pre-trial services office regarding this request. Pre-trial services consents to this request and the government defers to the position of the pre-trial services office.

By way of background, Mr. Coombs was arrested in April of 2022, and released on the condition of home confinement, with the understanding that he would reside in Pennsylvania. In February, 2022, the condition of home confinement was modified to a curfew. About six weeks ago, Mr. Coombs moved (with permission) to New York City, in large part to be closer to his nine-year old son. He now would like the curfew lifted so that he could bring his son to school in the morning and occasionally stay overnight with him.

We realize that sentencing is just fifteen days away, and that in the event that a sentence of incarceration is imposed, Mr. Coombs is likely to surrender several later. Nevertheless, Mr. Coombs and his son would benefit if they can spend the additional time together. I also note that Mr. Coombs has been fully compliant with all conditions of his release in the past 22 months. Accordingly, we ask that the bond be modified by removing the condition of a curfew.

Respectfully submitted,

/s/
James E. Neuman